

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

United States of America

v.

Carlos Antonio ALANIS

YOB: 1998 COC: USA

Case No. 7:19-MJ-0587

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 11, 2019 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 18 United States Code, Section 111A

A.*Offense Description*

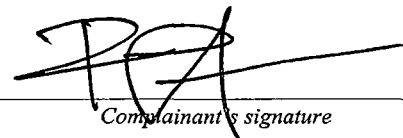
intentionally forcibly assaults, resists, opposes, impedes, intimidates and interferes with federal Customs and Border Protection Officers who were engaged in the performance of their official duties.

This criminal complaint is based on these facts:


See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date: 03/11/2019 - 8:32 a.m.City and state: McAllen, Texas

Complainant's signature

Rolando Lerma Jr., HSI Special Agent

Printed name and title

Judge's signature

Juan Alanis, U. S. Magistrate Judge

Printed name and title

Attachment A

I, Rolando Lerma Jr., Special Agent with United States Immigration and Customs Enforcement, Homeland Security Investigations (HSI), being duly sworn, depose and say the following:

On March 10, 2019, United States Customs and Border Protection Officers (CBPOs) reported to HSI Special Agent Rolando Lerma Jr. that two CBPOs were assaulted moments earlier by an adult male subject at the Roma, Texas Port of Entry. The subject was later identified as Carlos Antonio ALANIS, a United States Citizen.

On March 10, 2019, two CBPOs assigned to the Roma Texas Port of Entry (POE) were performing official duties at the mid bridge inspection area, when they first encountered ALANIS. During this initial inspection, a CBPO asked ALANIS for valid documents demonstrating proof of citizenship and ALANIS presented his Texas Driver License. CBPOs requested a document to prove U.S. Citizenship, such as a U.S. Passport or birth certificate. ALANIS then yelled profanities at both CBPOs stating he did not have or need any documents because he was a United States Citizen. ALANIS was asked to stop yelling and to cooperate as CBPOs requested proof of citizenship.

ALANIS continued to disregard CBPOs requests and started making verbal threats of physical harm towards the CBPOs. CBPOs asked the now belligerent ALANIS to turn around so they could handcuff him for their safety. ALANIS entered into an aggressive fighting stance and swung his fist towards the face of one of the CBPOs. Both CBPOs then attempted to restrain ALANIS who continued to ignore the verbal commands to comply given by the CBPOs. CBPOs grabbed ALANIS and fell to the ground. ALANIS punched one of the officers two to three times and continued to ignore the commands provided by the CBPOs to stop fighting and resisting.

CBPOs also reported that ALANIS grabbed at one of the officer's government assigned M4 carbine rifle in an unsuccessful attempt to pull it away from the officer. One of the CBPOs managed to radio for help and backup CBPOs arrived to help restrain the subject. Once safely secured in handcuffs, ALANIS was escorted by the CBPOs inside the Roma POE for further inspection.

HSI Special Agent Lerma read ALANIS his Miranda Warnings in English. ALANIS acknowledged he understood his rights and claimed he did not assault anyone.

Carlos Antonio ALANIS was arrested by HSI and transported to the Starr County Jail to await his initial appearance before the United States Magistrate Judge in McAllen, Texas.